

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE ALTA MESA RESOURCES, INC.
SECURITIES LITIGATION

CASE NO. 4:19-CV-00957

**AGREED MOTION TO EXTEND DEADLINE FOR CLASS PLAINTIFFS
TO FILE REPLY IN FURTHER SUPPORT OF MOTION TO UNSEAL**

Lead Plaintiffs FNY Partners Fund LP, FNY Managed Accounts, LLC, Paul J. Burbach and United Association National Pension Fund (f/k/a Plumbers and Pipefitters National Pension Fund) and Plaintiff Camelot Event Driven Fund (collectively, “Class Plaintiffs”), respectfully submit this agreed motion to extend the date for Class Plaintiffs to file a reply in further support of their Motion to Unseal Defendant McMullen’s Motion for Summary Judgment and Accompanying Exhibits (Dkt. 442). The current response deadline is December 8, 2023.

Good cause exists for an extension. The parties have conferred (and continue to do so) regarding the motion to unseal and other related disputes in connection with the sealing of these and other documents submitted in support of, and opposition to, the parties’ summary judgment briefing in an effort to narrow the disputes between them. As part of those efforts, Class Plaintiffs are continuing to analyze defendants Bayou City Energy and William McMullen’s Response in Opposition to Class Plaintiffs’ Motion to Unseal (Dkt. 498).

Additionally, significant work is ongoing in the case related to summary judgment and trial preparation. Expert discovery concluded on November 29, 2023, and the filing deadline for summary judgment motions and *Daubert* motions is December 22, 2023.

No party will suffer any prejudice from a reply being submitted by December 20, 2023 instead of December 8, 2023.

Counsel for Bayou City Energy and William McMullen is agreed to granting Class Plaintiffs until December 20, 2023 to submit their reply in further support of the motion to unseal.

Dated: December 8, 2023

Respectfully submitted,

/s/ Andrew J. Entwistle

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